

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CENTRAL STATES, SOUTHWEST AND)	
SOUTHWEST AREAS PENSION FUND; and)	
CHARLES A. WHOBREY, as Trustee,)	
)	Case No. 1:20-cv-5513
Plaintiffs,)	
v.)	Judge Charles P. Kocoras
)	
GILMER TRUCKING, LLC, an Indiana)	Magistrate Judge Jeffrey Cole
limited liability company,)	
)	
Defendant.		

**DEFENDANT’S UNOPPOSED MOTION FOR AN EXTENSION OF TIME
WITHIN WHICH TO FILE ITS RESPONSIVE PLEADING**

Defendant, Gilmer Trucking, LLC (“Defendant”), and requests that this Court allow it an additional 30 days, to and including November 30, 2020, within which to file its responsive pleading. In support of its Motion, Defendant states as follows:

1. Plaintiff’s Complaint was filed on September 17, 2020 and served on Defendant on October 9, 2020. Defendant’s responsive pleading was therefore initially due to be filed on or before October 30, 2020.
2. Plaintiff’s counsel advised Defendant’s counsel that Plaintiff does not oppose this Motion.
3. This Motion is not being brought for purposes of delay, and Plaintiff will not be prejudiced if this Motion is granted.
4. This is Defendant’s first request for an extension of time to file its responsive pleading.

WHEREFORE, Defendant respectfully requests that it be allowed an additional 30 days, to and including November 30, 2020, within which to file its responsive pleading in this case.

Dated: October 30, 2020

Respectfully submitted,

GILMER TRUCKING, LLC

By: /s/Debrai G. Haile
Debrai G. Haile
One of Its Attorneys

Debrai G. Haile (06243058)
William T. Daniels (6224750)
Laner Muchin, Ltd.
515 North State Street, Suite 2800
Chicago, Illinois 60654
(312) 467-9800
dhaile@lanermuchin.com
wdaniels@lanermuchin.com

CERTIFICATE OF SERVICE

Debrai G. Haile, an attorney, hereby certifies that he caused **Defendant's Unopposed Motion For An Extension Of Time Within Which To File Its Responsive Pleading** to be served on counsel for the parties of record (listed below), via Electronic Filing, through the U.S. District Court, Northern District of Illinois, on this 30th day of October, 2020.

Anthony E. Napoli
8647 W. Higgins Road, 8th Floor
Chicago, IL 60631
(847) 939-2469
tnapoli@centralstates.org
Attorney for Plaintiffs

/s/Debrai G. Haile
Debrai G. Haile